

EXHIBIT 12

From: donald@creadorelawfirm.com
Sent: Thursday, January 7, 2021 3:34 PM
To: Knudson, Jacquelyn Swanner; McClammy, James I.
Cc: Knudson, Jacquelyn Swanner; McClammy, James I.; Scott R. Bickford; Kent Harrison Robbins - KHR Law Offices; don creadore
Subject: RE: PURDUE PHARMA 19-cv-23649 NASAHC REQUEST TO MEET AND CONFER

Jacquelyn, Jim-

In addition to the need to meet and confer regarding issues surrounding the scientific information and the results of the UCC issued only earlier this week, the NASAHC also proposes a meet and confer on the subject of **discount card data**, as such information relates to birth mothers of children injured by prenatal opioid exposure and those diagnosed with NAS. This is another asset that undoubtedly favors and benefits creditors, including but not limited to NAS Claimants. Equally important, the unlocking of this asset (i.e., the data) will directly inure to the benefit of creditors in that it will enable claimants to satisfy the requirements of the Personal Injury Proof of Claim Form.

Also please consider this a renewal of our request to have your thoughts regarding availability to meet and confer on Friday at 2:30 p.m., as we had proposed yesterday.

May we please have your thoughts?

Many thanks,

Don

-----Original Message-----

From: "donald@creadorelawfirm.com" <donald@creadorelawfirm.com>

Sent: Wednesday, January 6, 2021 3:31pm

To: "Knudson, Jacquelyn Swanner" <jacquelyn.swanner@davispolk.com>, "McClammy, James I." <james.mcclammy@davispolk.com>

Cc: "don creadore" <Donald@creadorelawfirm.com>, "Scott R. Bickford" <srb@mbfirm.com>, "Kent Harrison Robbins - KHR Law Offices" <khrlawoffices.com>

Subject: PURDUE PHARMA 19-cv-23649

NASAHC

Hello Jacquelyn-

Hope the new year finds you well.

I wanted to advise DPW that two days ago, on Monday afternoon (1/4/21), the UCC provided the NASAHC with a report of the results of the search terms performed for (1) the Sackler-produced documents (including from NRF on behalf of the Sacklers and IACs), and (2) the Debtor-produced documents (including documents produced in these cases, as well as copies of productions that were made in pre-petition litigation).

The UCC transmittal communication observed that the volumes of results is very large, especially with respect to the Debtors. The UCC results are currently under review by us.

As a friendly reminder, Debtors' last communication with the court had advised that a meet and confer would transpire upon notification of the search results from the UCC; this event has now occurred.

What are your thoughts regarding:

(1) scheduling a meet and confer this week regarding the status of the UCC search results; our team is proposing Friday (1/8) at 2:30p est?

as well as

(2) circling back with the court with a status report to be filed (if you prefer jointly) *prior* to the January 2021 Omnibus Hearing?

May we please have your thoughts?

Many thanks,

Don

o/b/o Purdue NAS Children Ad Hoc

Donald E. Creadore

The Creadore Law Firm, P.C.

450 Seventh Avenue - Suite 1408

New York, New York 10123

(O) 212.355.7200

(C) 917.226.1881

donald@creadorelawfirm.com

CONFIDENTIALITY NOTICE: The information contained in this email message is protected under the Electronic Communications Privacy Act, 18 U.S.C. 2310-2321, and may also be protected by attorney-client and/or the attorney/work product privileges. It is intended only for the use of the individual named above and the privileges are not waived by virtue of this having been sent by email. If the person actually receiving this email or any other reader of the email is not the named recipient, any use, dissemination, distribution, or copying of the communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone at 212-355-7200 and return the original message to us.

SPECIAL NOTICE TO CLIENT(S): If you are a client of this firm and this e-mail is directed to you. DO NOT FORWARD to any other party, or you could be waiving the attorney-client privilege.